

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CASE NO: 4:18-CR-274
)	
PABLO RANGEL-RUBIO,)	
JUAN RANGEL-RUBIO, and)	
HIGINIO PEREZ-BRAVO)	

**JOINT MOTION TO AMEND
PROTECTIVE ORDER GOVERNING DISCOVERY**

The parties in this case jointly move to amend the discovery protective Order entered on February 4, 2019 (“Order”). Dkt. No. 63.

In particular, page two of the Order currently requires that discovery be possessed by a Defendant only in the presence of Defendant’s counsel. That restriction has proved unduly burdensome in light of the voluminous nature of discovery, disparate locations of counsel, and number of investigative and other non-attorney staff members assisting defense counsel in this case. Accordingly, the proposed amendment clarifies that Defendants may possess discovery material in the presence of investigative, secretarial, clerical, and paralegal personnel retained by or affiliated with Defendants’ counsel of record. No other amendment is proposed.

Signatures on the Following Page

Respectfully submitted,

<p><u>/s/Tania D. Groover</u></p> <p>Tania D. Groover Assistant United States Attorney Georgia Bar No. 127947 Post Office Box 8970 Savannah, Georgia 31412 Telephone: (912) 652-4422 tania.groover@usdoj.gov</p>	<p><u>/s/ Chris Howard</u></p> <p>Chris Howard Assistant United States Attorney New York Bar No. 4935938 Post Office Box 8970 Savannah, Georgia 31412 Telephone: (912) 652-4422 Christopher.howard@usdoj.gov</p>
<p><u>/s/ W. Dow Bonds</u></p> <p>W. Dow Bonds The Bonds Law Firm 33 Bull Street, Suite 540 Savannah, GA 31401 Telephone: (912) 335-3220 dowbonds@yahoo.com Attorney for Pablo Rangel-Rubio</p>	<p><u>/s/ Jeffrey L. Ertel</u></p> <p>Jeffrey L. Ertel Federal Defender Program, Inc. 101 Marietta Street, Suite 1500 Atlanta, GA 30303 Telephone: (404) 688-7530 jeff_ertel@fd.org Attorney for Pablo Rangel-Rubio</p>
<p><u>/s/ George R. Asinc</u></p> <p>George R. Asinc Asinc and Associates 445 Goshen Road Rincon, GA 31326 Telephone: (912) 484-7431 geo6152@comcast.net Attorney for Juan Rangel-Rubio</p>	<p><u>/s/ Mark Evan Olive</u></p> <p>Mark Evan Olive Law Offices of Mark E. Olive, PA 320 W. Jefferson Street Tallahassee, FL 32301 Telephone: (850) 224-0004 meolive@aol.com Attorney for Juan Rangel-Rubio</p>
<p><u>/s/ Bobby Phillips</u></p> <p>Robert Paul Phillips, III Phillips, Carson & Phillips 420 W. Broughton Street, 2nd Floor Savannah, GA 31401 Telephone: (912) 232-0081 BPLAW@msn.com Attorney for Higinio Perez-Bravo</p>	<p><u>/s/ John R. Martin</u></p> <p>John R. Martin Martin Brothers, P.C. 1099 St. Louis Pl, Atlanta, GA 30306 Telephone: (404) 433-7446 jack@martinbroslaw.com Attorney for Higinio Perez-Bravo</p>